



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 15 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7642 3014
RETURN RECEIPT REQUESTED

Ms. Rachel Bessette
EHS Manager
Carboline Company
614 Elizabeth Street
Green Bay, Wisconsin 54302

Re: Notice of Violation
Compliance Evaluation Inspection
WID 006 130 405

Dear Ms. Bessette:

On February 1, 2017, representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources inspected the Carboline Company located in Green Bay, Wisconsin (hereinafter "Carboline," "facility," or "you"). As a large quantity generator of hazardous waste, Carboline is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate Carboline's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Carboline, EPA's review of records pertaining to Carboline, and the inspector's observations, EPA has determined that Carboline has unlawfully stored hazardous waste without a license or interim status as a result of Carboline's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirements violated by Carboline in paragraphs 1 – 3, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, Carboline violated the following large quantity generator license exemption requirements:

1. Hazardous Waste Container Dating and Labeling

Under Wis. Admin. Code §§ NR 662.034(1)(b) and (c) [40 C.F.R. §§ 262.34(a)(2) and (3)], a large quantity generator storing hazardous waste in containers must mark on each

container the date upon which each period of accumulation begins. The date on each container must be visible for inspection. Furthermore, each container storing hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste."

At the time of the inspection, Carboline maintained a less than 90-day hazardous waste storage area in the southwest corner of its pigment storage warehouse. Fifty-five gallon drums storing hazardous waste were stacked on pallets in the area and stored closely together. Because Carboline had placed labels on the top lids of its 55-gallon drums, the labels and dates of the majority of the hazardous waste containers in the area were not readily visible for inspection. Carboline, therefore, violated this license exemption requirement.

2. Required Aisle Space

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0035 [40 C.F.R. §§ 262.34(a)(4); 265.52(e)], a large quantity generator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

At the time of inspection, Carboline maintained a less than 90-day hazardous waste storage area in the southwest corner of its pigment storage warehouse. Fifty-five gallon drums storing hazardous waste were stacked on pallets in the area and stored closely together. The storage configuration made it difficult to inspect the hazardous waste drums and would likely obstruct the movement and effectiveness of fire protection, spill control, and decontamination equipment in the event of an emergency. Carboline, therefore, violated this license exemption requirement.

3. Satellite Accumulation Container Management

Under Wis. Admin. Code §§ NR 662.0034(3)(a)(1) and (2) [40 C.F.R. §§ 262.34(c)(1)(i) and (ii); 265.173(a)], a generator may accumulate as much as 55 gallons of hazardous waste in containers ("satellite containers") at or near the point of waste generation which are under the control of the operator of the process generating the waste without a license or interim status, as long as the container is closed except when necessary to add or remove waste. Furthermore, the satellite containers must be marked with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the inspection, Carboline was accumulating hazardous waste in five-gallon bucket satellite containers in its peroxide mixing room. There were four closed buckets in the designated satellite accumulation area but only two had labels specifying their contents. Additionally, Carboline was accumulating waste solvent in a small red container in a test spray room in its quality control laboratory. At the time of the inspection, this container was open when waste was not being added or removed.

Photographs provided later on the day of inspection indicated that the buckets in the peroxide mixing room had been labeled and the small container in the quality control laboratory had been closed. Thus, no further action is necessary to comply with this license exemption requirement.

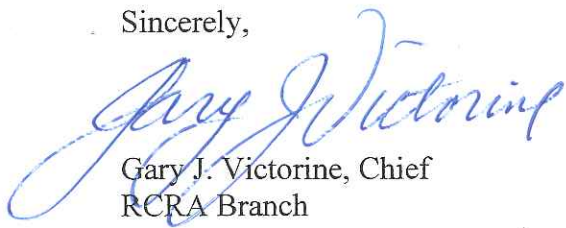
Summary: By violating the requirements for a license exemption, above, Carboline became an operator of a hazardous waste storage facility and was required to obtain a Wisconsin hazardous waste storage license. Carboline failed to apply for such a license. Carboline's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Carboline to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the requirements for a license exemption outlined in paragraphs 1 and 2, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken to establish compliance with the above license exemption requirements. You should submit your response to Mr. Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-17J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Dong-Son Pham, WDNR, dongson.pham@wisconsin.gov
Michael Ellenbecker, WDNR, michael.ellenbecker@wisconsin.gov



U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE: February 1, 2017

SITE NAME: Carboline Company

ADDRESS: 614 Elizabeth Street
Green Bay, Wisconsin 54302

EPA ID NUMBER: WID 006 130 405

GENERATOR STATUS: Large Quantity Generator (2015)

NAICS CODE: 32551 Paint and Coating Manufacturing

FACILITY CONTACT: Rachel Bessette
Environmental, Health and Safety Manager

EPA INSPECTOR: Brian Kennedy
Environmental Engineer
Compliance Section 2
RCRA Branch
Land and Chemicals Division

PREPARED BY:


Brian Kennedy

2/27/2017
Date

APPROVED BY:


Julie Morris, Chief
Compliance Section 2

2/28/17
Date

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of the Carboline Company (hereinafter Carboline or facility) located at 614 Elizabeth Street, Green Bay, Wisconsin took place on February 1, 2017. The CEI was conducted by U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Ohio Administrative Code and the Code of Federal Regulations. Specifically, the CEI was an evaluation of Carboline's compliance with the regulations governing large generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Rachel Bessette – EHS Manager	Carboline
Jesse Hansen – Operations Manager	Carboline
Chris Skaleski – Production Manager	Carboline
Tonya DeBroux – Human Resources Manager	Carboline
Stephen Thetford – Director of EHS	Carboline
Dong-Son Pham – Environmental Specialist	WDNR
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM CST with Dong-Son Pham of the WDNR, entered the front office and described the purpose of our visit. Ms. Rachel Bessette, Carboline's EHS Manager, and Mr. Jesse Hansen, the Operations Manager, arrived and stated that they were currently involved with a planned Department of Homeland Security (DHS) inspection, but that other Carboline employees would be able to assist. Mr. Chris Skaleski, Production Manager, and Ms. Tonya DeBroux, Human Resources Manager, arrived at the front office and stated they would be able to provide a tour of the site. I presented Mr. Skaleski my enforcement office credentials. I described the purpose of the U.S. EPA-lead RCRA inspection and the process by which I would conduct the inspection, including a site tour that would involve photographs as well as a review of records pertaining to hazardous waste. I informed Mr. Skaleski of Carboline's right to claim information or documents collected during the inspection as confidential business information.

As conference space was limited on the day of the inspection, it was decided to start the site tour with Mr. Skaleski and Ms. DeBroux and forego an initial opening conference. Mr. Hansen and Ms. Bessette stated they would assist in the inspection as soon as the DHS inspection was complete.

Site Description

The following information about Carboline is based on personal observations of the EPA inspector and representations made during the inspection by facility personnel identified above or within the text, unless otherwise specified.

The Carboline Company is a global manufacturer and supplier of specialty coatings, linings and fireproofing materials. Carboline's coatings are manufactured to provide corrosion protection, fire protection, chemical resistance, long-term weatherproofing, insulation and abrasion protection. The company was founded in 1947 and is now a subsidiary of RPM International, Inc.

The Carboline facility in Green Bay, Wisconsin is one of several of the company's manufacturing facilities, and works to produce coatings for use in highly abrasive industries such as construction, energy production and transportation. The facility produces coating batches in volumes ranging from two ounces to 275 gallons, and has over 1,000 unique product formulations. Common or popular products are usually mixed in large batches and stored on site. When an order for that material is placed, Carboline will pull from the existing batch to meet customer needs. Large batches are mixed in Carboline's large stationary mixers, which can create a batch size of 900 to 1,200 gallons in movable open-top steel tanks. Product from these large batches can be drained into smaller, more portable 55-gallon drums or buckets for storage or shipment. Carboline's products are generally created by mixing wet or dry pigments, specific solvent blends and other additives or catalysts. Some products come in what are known as "Part A" and "Part B" components. When a customer receives the separate Part A and Part B products, they are mixed at the location of use and react to create the required coating properties. Carboline maintains an outdoor solvent storage tank farm that supplies its production process and also operates a separate chemical storage warehouse and distribution center at 2122 Angie Avenue in Green Bay.

The largest hazardous waste streams generated by Carboline include waste paint related materials, including those materials separated into Part A paint waste and Part B amine-based (paint) wastes. These materials are characterized as D001 hazardous waste by Carboline. Other waste streams are separated based on the chemical makeup of the product, including peroxide, styrene monomer and isocyanate waste, and aluminum, cobalt, and zinc-based coating waste. Carboline uses MEK and xylene to clean its equipment, primarily the batch mix containers and tanks. Both waste solvent and wipes or rags generated during cleaning are generally referred to as Part A or Part B wash and rags. These materials are both characterized as D001 and F003 hazardous waste. Smaller, metal-bearing waste streams may occasionally be generated but are not a regular hazardous waste source. Used oil is not typically generated on site. Universal waste lamps and batteries are sometimes generated and later shipped off site to Lamp Recyclers, Inc. of Green Bay.

Carboline has approximately 85 employees at its Elizabeth Street location. The work schedule is three shifts Sunday through Friday, although occasionally full weekends are staffed to meet demand. Carboline has a dedicated sprinkler system throughout the facility in addition to portable fire extinguishers. The water-based sprinklers are currently being replaced with a foam-based suppression system.

Site Tour

Mr. Skaleski and Ms. DeBroux started leading Mr. Pham and I through a tour of Carboline. The site tour began in the warehouse and can-labeling area at the southwest portion of Carboline's production floor. Here, Carboline applies product labels and specifications to empty containers that will later be filled with product. Mr. Skaleski pointed out ongoing construction in the area related to the installation of a foam fire-suppression system that would replace existing water sprinklers. Mr. Skaleski pointed out sprinkler heads along the dedicated shelving units that stored Carboline chemicals and product adjacent to the can-labeling area.

The tour continued to the pigment storage warehouse on the north side of the facility. Much of the warehouse space was used to store empty 55-gallon drums that were waiting to be filled with product. Shelving units around the perimeter of the warehouse were storing dry and wet pigments in bags and liquid containers. In the southwest corner of the room was Carboline's 90-day hazardous waste storage area. The storage area had a small concrete berm to prevent spillage into the larger warehouse. There were approximately 26 55-gallon drums in the area, many of which were stacked on wooden pallets, as well as four red 5-gallon buckets. Two of the red buckets were outside of the concrete berm (See Photos 1 and 2 in Attachment A: Inspection Photographs). Carboline had placed labels and dates on the tops of its 55-gallon drums, making it difficult or impossible to view the contents and storage time of the majority of the drums in the storage area. Furthermore, the drums were stacked together closely and movement between or around the drums was limited. The labels on two of the 55-gallon drums were readily visible (See Photo 3). The earliest date was January 19, 2017 and both were marked as hazardous waste. The red buckets were all labeled and dated. Instructions for hazardous waste storage and management were posted on the wall behind the storage area, but were difficult to view behind the 55-gallon drums (See Photo 4). There were sprinklers overhead in the area, a nearby fire extinguisher and a spill kit in a corner opposite the waste storage area. Mr. Skaleski and Ms. DeBroux stated that hazardous waste shipments occur very frequently from the site.

Mr. Skaleski led the tour out the north exit of the pigment warehouse to Carboline's tanker truck pumping area. Here, tanker trucks bringing in bulk solvent shipments unload the solvent into the outdoor storage tank farm. Mr. Skaleski pointed out that the pumping area was bermed and contained with a blind sump.

The tour continued back inside to the loading dock south of the pigment warehouse. Mr. Skaleski pointed out another blind sump near the loading dock doors that would prevent spills from leaving the building. He also pointed out a heated storage area where certain chemicals must be kept to prevent them from hardening and becoming unusable.

Moving further south in the production floor was the bulk liquid and mixing tank storage area. Dedicated shelving in this area is used to store bulk chemicals for use in later production as well as previously-mixed product batches in large (e.g., 500 gallon) mixing tank containers. These containers generally hold popular Carboline products, and material is drained from them as necessary to satisfy customer demand. This area is also used to store empty mixing tank containers that have been cleaned and are ready for reuse.

To the east of the bulk storage area were two of Carboline's large stationary mixers. The two mixers had the capacity to prepare upward of 900 gallon batches. Mr. Skaleski pointed out the drainage system that was used to move finished product from the mixing container into smaller containers such as 55-gallon drums. The two stationary mixers were both in a steel containment system with blind sumps. There was no waste observed around the mixers.

Carboline's small batch peroxide-based products are prepared in a small, enclosed peroxide mixing room north of the 900-gallon mixers. Carboline prepares much of its reactive Part A and Part B products in this room. Inside the peroxide room was a satellite accumulation area with four red 5-gallon buckets. Two of the buckets were labeled as containing rags and "Part C" waste, while the remaining two buckets were not clearly marked. On the wall above the buckets was a "Hazardous Waste Organic Peroxide" label as well as a label that stated "Satellite Accumulation Area 13, 14 and 15." Carboline numbers its hazardous waste satellite accumulation areas around its site. A photo was not taken in this room because of concerns of ignitable vapors.

The tour continued to a second-floor quality control laboratory. In a small test spray room adjacent to the main laboratory area, Carboline tests its products on various substrates to ensure they are coating as intended. In the corner of this test spray room was a small red bucket accumulating hazardous waste purge solvent. The bucket was labeled but was open. The bucket was later closed during the tour (See Photo 5). In the main lab area, hazardous waste solvent-contaminated wipes and rags were accumulating in two red waste receptacles. Both receptacles were labeled but the flip-top lids on both containers did not allow them to fully close when not in use (See Photos 6 and 7).

From the quality control lab, the tour continued to Carboline's main mixing areas along the eastern side of the facility. Two other large stationary mixers were along the southern wall of the area, both of which were in steel containment structures. Under both mixers were 55-gallon drums labeled as Part A and Part B wash. Mr. Skaleski clarified that the mixing tanks are cleaned with this material and once the material is no longer useful, it is determined to be a hazardous waste and moved into the 90-day storage area. Part A and Part B wash represent two different solvent blends and are chosen depending on the material that needs to be cleaned. Along the west wall was a satellite accumulation area for waste liquid isocyanate and isocyanate-contaminated rags in a 55-gallon drum and 5-gallon bucket, respectively. Both containers were labeled and closed (See Photo 8). Mr. Hansen joined the tour at this point and Ms. DeBroux departed.

North of the main mixing area was a small cobalt-based product mixing area, one of Carboline's smaller volume products. A satellite area here was accumulating "Waste Cobalt" and waste "Cobalt Rags" and in two 5-gallon buckets. Both buckets were labeled and closed (See Photo 9). Adjacent to this satellite area was an exit door leading to Carboline's outdoor storage tank farm. The tour briefly went out to see the tank farm and Mr. Skaleski explained that two of the four tanks held solvent mixtures while the other two held resins. The tanks were in a shared concrete containment structure but snowfall covered much of the area. Mr. Skaleski stated the material safety data sheets were available for the contents of each tank.

Back inside the mixing area was another satellite accumulation area for styrene monomer waste and aluminum and zinc-containing wastes. The waste streams were accumulating in three 55-gallon drums, all of which were closed, labeled as hazardous waste and grounded (See Photo 10). Mr. Skaleski explained that the drums were wrapped in plastic sheeting to keep them clean before pick-up for disposal.

The tour continued east from the previous satellite accumulation area into Carboline's filling area. Here, Carboline employees manually fill smaller containers (e.g., 1 gallon capacities) with product from larger batches. A satellite accumulation area was located adjacent to the filling equipment. This area was accumulating hazardous waste Part B-contaminated rags and Dryzorb absorbent material used to clean up spills in two 55-gallon drums. Both drums were labeled and closed (See Photo 11).

The tour moved south from the filling area to the portable tank cleaning area. Carboline uses solvents in this area to clean out used batch mixing tanks and, once cleaned, the tanks are moved into storage for reuse. Mr. Skaleski explained the cleaning process in which a clean Part A wash from a nearby drum was used to rinse the inside of the tank. When the material becomes dirty it is accumulated in a second drum and, when full, that drum is moved to the 90-day hazardous waste storage area. Along the wall behind the cleaning area were four 55-gallon drums in a designated satellite accumulation area. Three of the drums were accumulating hazardous waste and the fourth contained the clean Part A wash. The three hazardous waste drums contained Part A paint sludge, Part A solvent-contaminated rags and the "dirty" Part A wash. The three drums were closed and labeled (See Photo 12). To the right of the dirty Part A wash drum was a parts washer that was using clean Part A wash. This parts washer is used specifically to clean the drainage valves that are removed from the bottom of the batch mix tanks during cleaning. A similar setup is used for tanks that need cleaning with Part B wash. Another satellite accumulation area in the same cleaning area contained a 55-gallon drum of hazardous waste "dirty" Part B wash. The drum was closed and labeled, and to its left was a second parts washer that contained Part B wash to clean drainage valves (See Photo 13).

At this point Ms. Bessette rejoined the tour and we continued east outside to Carboline's dust collection system. Ms. Bessette explained that this dust collector was the only air pollution control device on site, and that dust that is collected has been characterized as non-hazardous waste. The dust is collected in three cardboard drums underneath the collection unit and are changed out very infrequently.

Back inside the facility, I asked those on the tour where used oil and universal waste may be accumulated on site. Ms. Bessette said that used oil was not generated on site on a regular basis and fork lift oil changes are managed by a third party when necessary. Universal waste is sometimes accumulated on site but a recent shipment had removed all universal waste from the site. The tour concluded and we proceeded to the main office to review records.

Record Review

Ms. Bessette and Mr. Stephen Thetford, Carboline's corporate EHS Director, provided records pertaining to hazardous waste. Before any records were reviewed, I provided Ms. Bessette a confidential business information disclaimer.

Annual waste reports that were submitted to the WDNR were reviewed for years 2014 and 2015. At the time of the tour, the 2016 report had not yet been submitted.

Hazardous waste manifests were reviewed for years 2014, 2015 and 2016. Land disposal restrictions notification forms were located for a variety of waste streams that had been provided by a variety of the final disposal facilities that accept Carboline's hazardous waste. These disposal facilities included Tradebe, Clean Harbors El Dorado and Rineco, among others.

Hazardous waste training session attendance records were reviewed for years 2014, 2015, and 2016. The names of trainees in attendance matched those observed signing the hazardous waste manifests. All training events on hazardous waste management were provided by Ms. Bessette, who had previously taken online RCRA hazardous waste training through Lion Technology, Inc. The most recent employee training session had occurred on June 2, 2016.

Waste profiles and analytical records were reviewed for the following waste streams: peroxide-contaminated rags (D001), waste flammable liquid (solvents) (D001, D035, F001), Carbo-zinc (D001), waste solvent and paint containing aluminum (D001, F003), contaminated Dryzorb absorbent material, Part B Amines waste paint and solvent (D001, D002, F003), Part A waste paint and solvents (D001, D035, F003, F005), styrene monomer waste (D001), and isocyanate waste. The isocyanate waste profile listed the material as non-RCRA regulated. Ms. Bessette stated Carboline may manage the material as hazardous waste as a precaution.

Carboline's hazardous waste contingency plan lists Mr. Hansen as its primary emergency coordinator and Ms. Bessette as the alternate coordinator. The plan contained agreements with the local police and fire departments about emergency response procedures and listed the emergency equipment on site, its location and function. Evacuation procedures were detailed and routes and rally points were established on a facility diagram.

Other documents reviewed included Carboline's waste minimization plan and hazardous waste storage area inspection logs from 2013 to present.

Closing Conference

I summarized my review of the site and potential issues to Mr. Hansen, Mr. Thetford and Ms. Bessette. The potential issues that were discussed included:

- Container management and labeling in the 90-day hazardous waste storage area
- Labeling and management of satellite accumulation containers, including those in the peroxide room and quality control laboratory

No confidential business information claims were made during the inspection.

The inspection ended at approximately 1:00 PM.

Inspection Follow-Up

Later on the day of the inspection, Ms. Bessette provided an email addressing several of the issues identified on site. Three photos in the email displayed that satellite containers in the

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February 1, 2017

peroxide room had been labeled, that the satellite container in the quality control lab test spray room remained closed, and that the 5-gallon buckets near the 90-day hazardous waste storage area had been placed inside the storage area berm. Ms. Bessette also provided a receipt indicating that several new containers similar to those seen in the quality control lab had been purchased to store hazardous waste rags. This information is provided in Attachment B.

Attachments

- A. Inspection Photographs
- B. Inspection Follow-Up Information
- C. Inspection Checklists

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Time (CST)
1	The 90-day hazardous waste storage area in Carboline's pigment storage warehouse.	9:36 AM
2	5-gallon buckets in the 90-day hazardous waste storage area seen in Photo 1.	9:35 AM
3	Two visible labels on the 55-gallon drums in the 90-day hazardous waste storage area.	9:36 AM
4	Hazardous waste management instructions in the 90-day storage area were obscured by 55-gallon drums.	9:36 AM
5	A 5-gallon satellite bucket accumulating hazardous waste in the quality control laboratory test spray room. The bucket was open moments before the photo was taken.	10:01 AM
6	A satellite container in the quality control lab accumulating waste rags.	10:01 AM
7	A satellite container in the quality control lab accumulating waste rags and wipes. The lid on this container could not tightly close.	10:02 AM
8	A satellite accumulation area with waste liquid isocyanate and isocyanate-contaminated rags in the main mixing area.	10:17 AM
9	Two 5-gallon satellite buckets accumulating waste cobalt liquids and cobalt-contaminated rags north of the main mixing area.	10:20 AM
10	A satellite area with 55-gallon drums accumulating waste styrene monomer and aluminum and zinc-containing coating waste. This area was near the northern exit to the outdoor tank farm.	10:25 AM
11	A satellite area accumulating waste Part B-contaminated rags and used Dryzorb near the filling area.	10:28 AM
12	Satellite containers in the portable tank washing area accumulating Part A paint sludge, rags and contaminated solvent wash.	10:33 AM
13	Satellite containers in the portable tank washing area accumulating contaminated Part B solvent wash.	10:33 AM

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Photo 1:



Carboline Company
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Photo 2:



Carboline Company
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Photo 3:



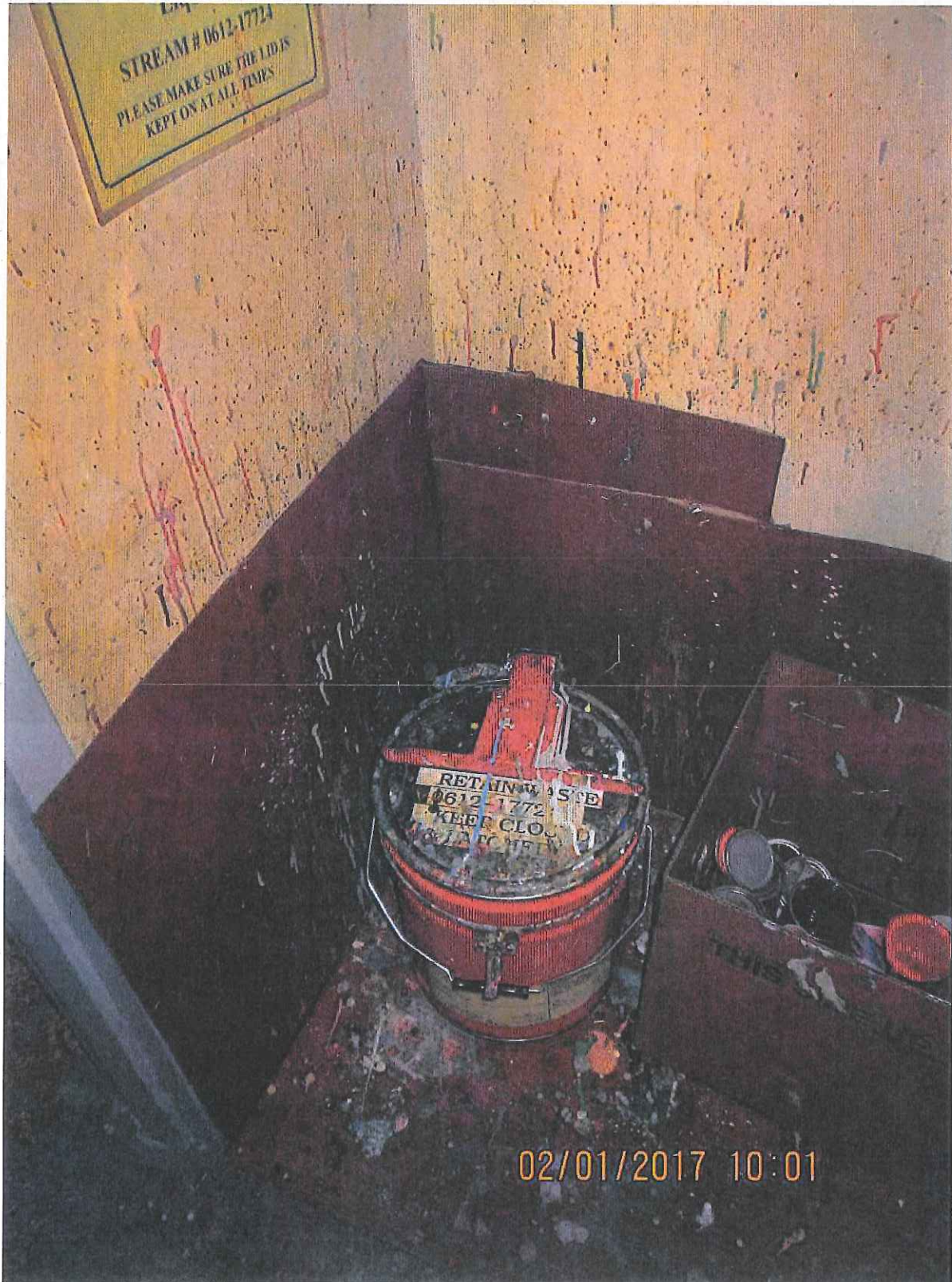
Carboline Company
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Photo 4:



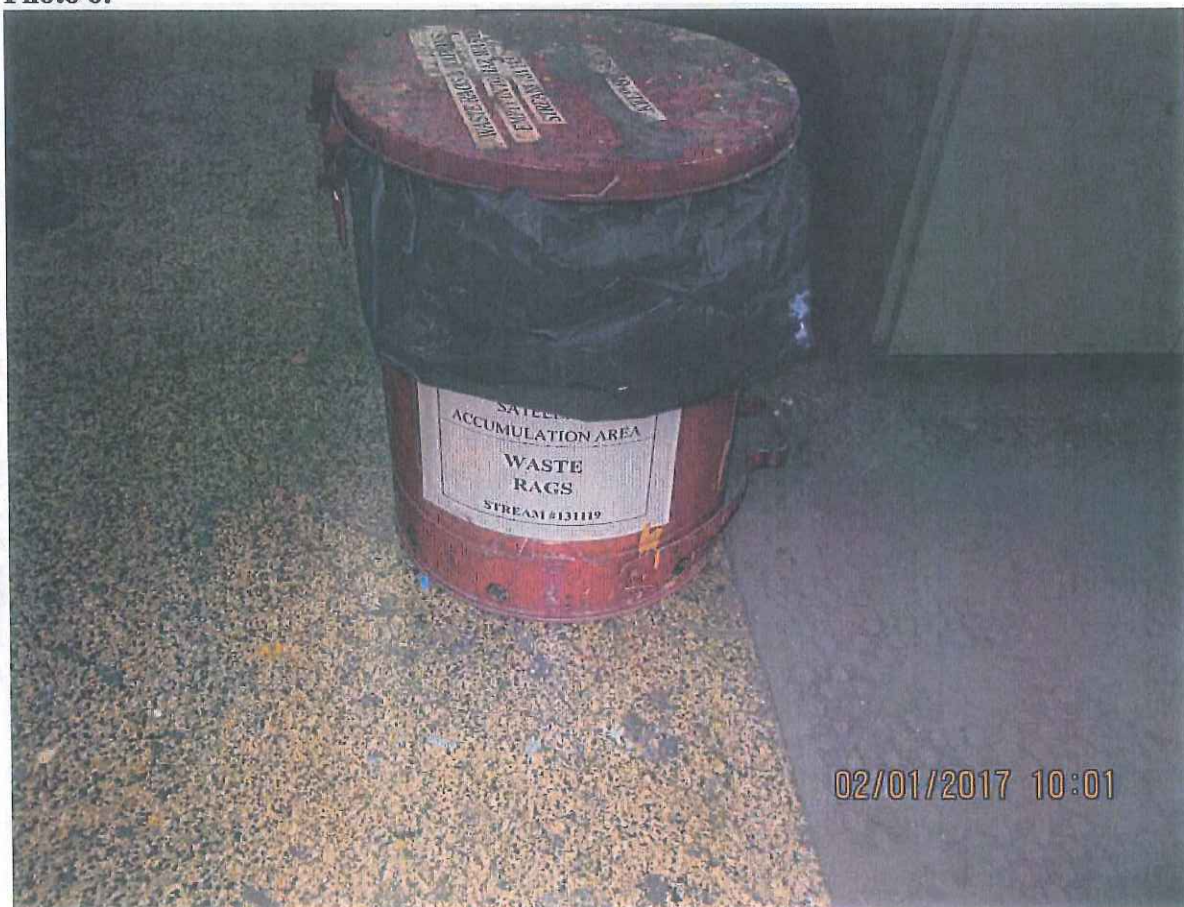
Carboline Company
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Photo 5:



Carboline Company
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Photo 6:



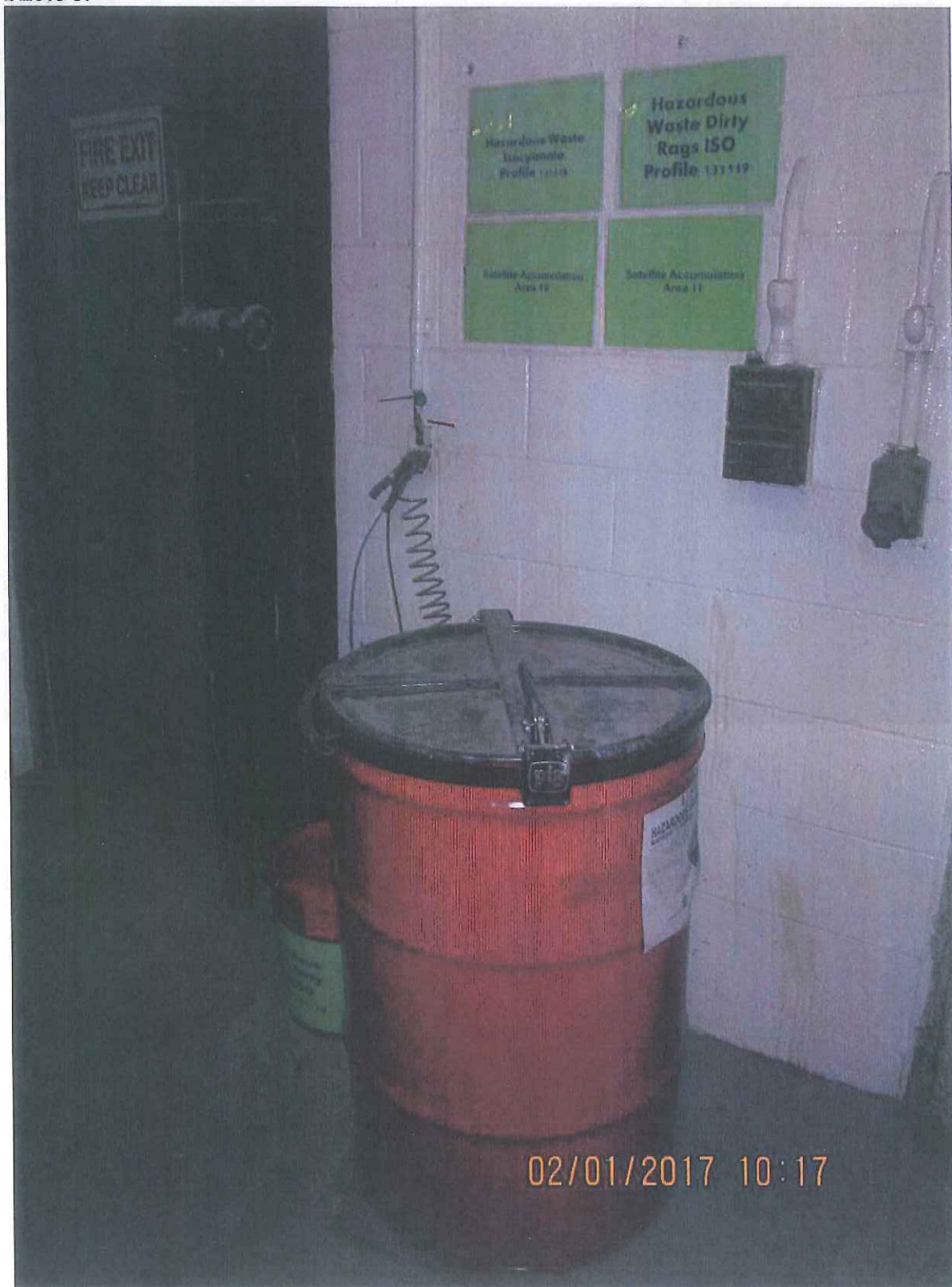
Carboline Company
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Photo 7:



Carboline Company
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Photo 8:



Carboline Company
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Photo 9:



Carboline Company
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Photo 10:



Carboline Company
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Photo 11:



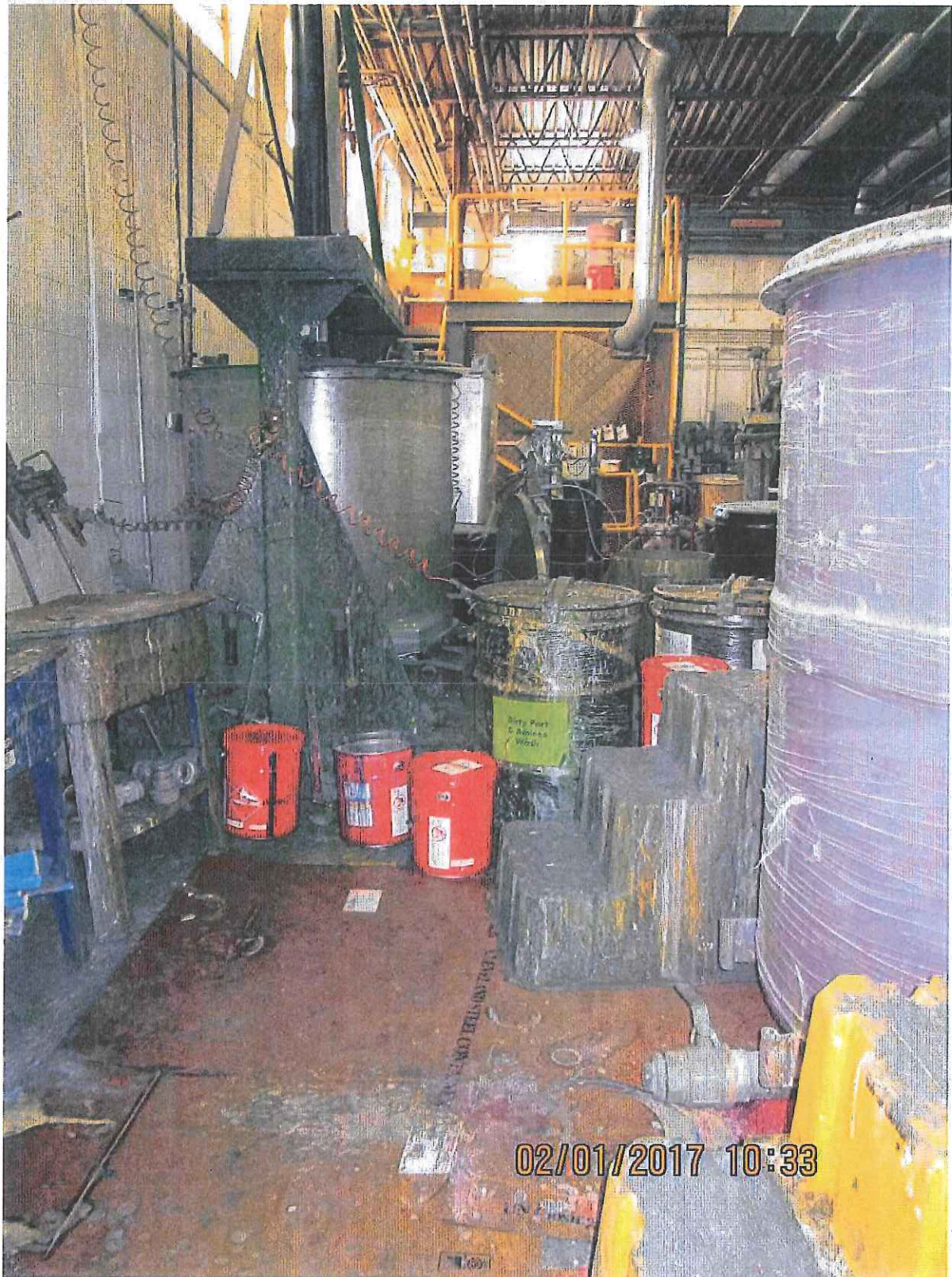
Carboline Company
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Photo 12:



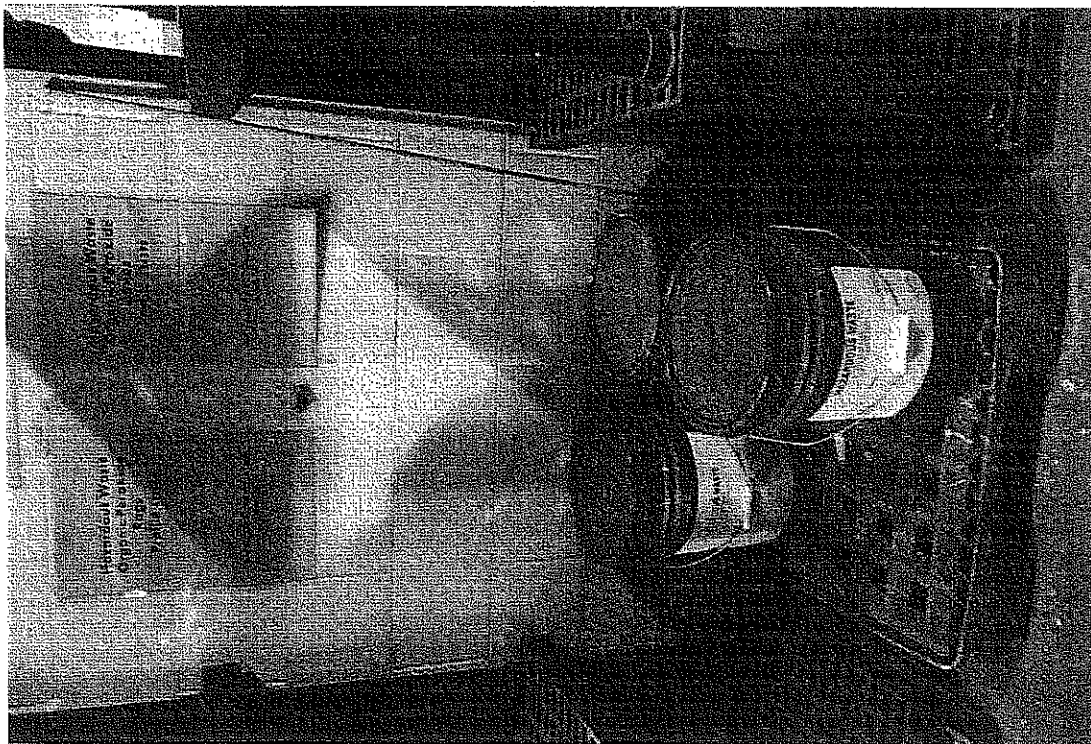
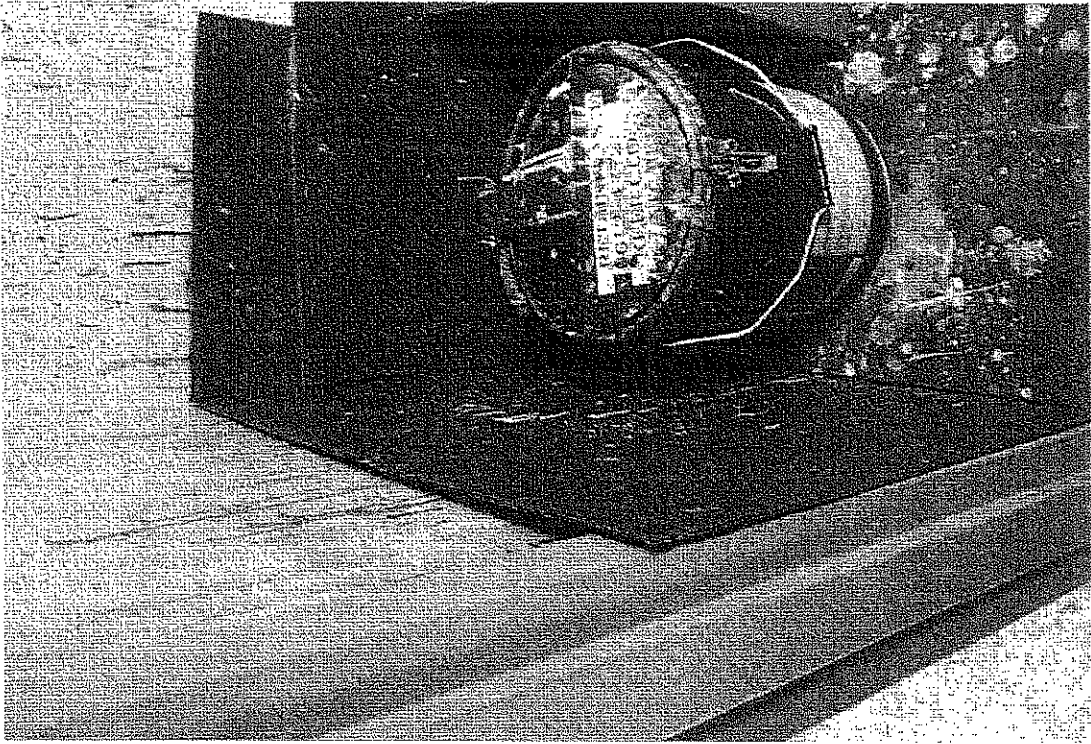
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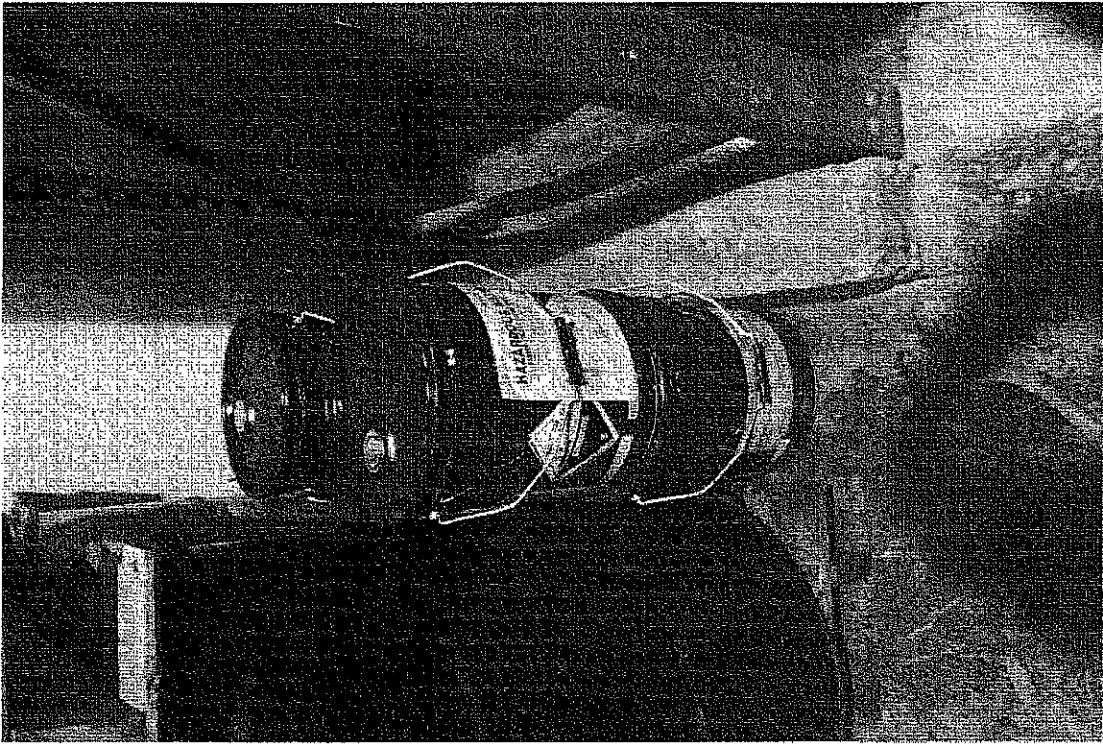
Photo 13:



Carboline Company
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February 1, 2017

ATTACHMENT B: Inspection Follow-Up Information







ASTRITE Red
Galvanized Steel Oil
Waste Can, 14 gal.
Capacity, Foot Operated
Self Closing Lid Type
Item #3AL71
Your Price: \$89.99

2

Expected to arrive
Thu. Feb 01.

\$179.10

My Contact Address:
Caroline Company
614 Elizabeth St
Address 2 (Optional)
Green Bay WI 54302-1813
USA

SHIPPING METHOD

Standard

FREE

PAYMENT

My Grainger Open Account



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ATTACHMENT C: Inspection Checklists



Revision: 08/15/2016
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	C	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	C	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	C	662.011(3)(a)1
D. Generator keeps records of any test results, waste analysis or other determinations for at least three years from the date the waste was last sent to a treatment, storage or disposal facility.	C	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#.	C	662.012
Note: A subsequent notification should be submitted when there is an ownership or name change.		

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	C	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	C	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	C	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	C	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	C	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	C	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	C	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.031



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Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.032(2)
N. Placards are offered to the initial transporter. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	C	668.07(1)
B. A copy of the LDR notification and certification shall be maintained on-site in the facility records for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	C	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	C	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	C	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	C	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	C	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	C	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	C	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	C	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d)

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Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	C	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	C	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	C	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	C	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	C	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	C	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	X	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A and leave questions 6.C to 6.G blank.	Y	662.034(1)(d)
B. If generator has an amended SPCC plan or other emergency plan it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	NA	662.034(1)(d)



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Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	C	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	NI	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	C	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	C	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	C	662.034(1)(d)

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A and leave questions 7.B to 7.I blank.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	C	662.034(1)(d)

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Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	C	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	C	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	C	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	C	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	C	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	C	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	C	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9 and leave questions 8.B to 8.L blank.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	X	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	X	662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	C	662.034(1)(a)1



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Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	C	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	C	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	C	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	C	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2) and leave questions 9.B to 9.H blank. 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)); 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)); 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at $< 10\%$. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)



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Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1) and leave questions 10.B to 10.Q blank. 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2, NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	N	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	C	662.034(1)(a)1



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Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	NA	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NI	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	NI	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NI	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NI	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	NA	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	NI	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	NI	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12 and leave questions 11.B to 11.M blank.	N	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2

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Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.	662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))	662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))	662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)	662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)	662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)	662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)	662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)	662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13 and leave questions 12.B to 12.E blank.	N
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))	662.034(1)(a)2

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Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14 and leave questions 13.B to 13.I blank.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NI	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	R/CA	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	X	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	NI	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	C	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.	C	662.027(1)
Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.		

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Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16 and leave questions 15.B to 15.H blank.	N	
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2)
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling arrangement.		679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.		679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17 and leave questions 16.B to 6.M blank.	Y	
Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.		
B. Universal waste has not been disposed, treated or diluted.	C	673.11
Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.		
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	NI	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	NI	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	NI	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	NI	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NI	673.15(2)



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Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	NI	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	C	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	NI	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	C	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NI	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	NA	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18 and leave questions 17.B to 17.L blank.	N	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b

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Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	C	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	Y	
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NA	662.034(1)(a)2

